



March 1, 2022

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The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

In accordance with Your Honor's instructions at the February 22, 2022 status conference, we write on behalf of the *Federal Insurance* plaintiffs concerning the lifting of the stay of judicial enforcement of the *Havlish* and *Doe* plaintiffs' writs of execution.

The *Federal Insurance* plaintiffs did not previously oppose the *Havlish* and *Doe* plaintiffs' motions to lift the stay,¹ and do not oppose the lifting of the stay now.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", written over a light blue circular stamp.

SEAN P. CARTER

¹ The Court appears to have understood the *Federal Insurance* plaintiffs' February 16, 2022 letter, ECF No. 7675, as joining in certain other plaintiffs' oppositions to lifting the stay. *See* Opinion and Order at ECF No. 7696 at p. 3 (referencing letters understood by the Court as opposing the lifting of the stay). The *Federal Insurance* plaintiffs' intent in their February 16, 2022 letter was simply to affirm the *Federal Insurance* plaintiffs' position concerning their 2007 motion for assessment of damages as to the Taliban, as set forth in their earlier December 22, 2021 letter, *see* ECF No. 7498, in light of the United States' Statement of Interest. The *Federal Insurance* plaintiffs apologize for not being more clear in their February 16, 2022 letter that they were not opposing the lifting of the stay.

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cc: All MDL Counsel of Record (via ECF)